

State Ethics Commission

ANNUAL REPORT 1992



STATE OF MARYLAND
EXECUTIVE DEPARTMENT

WILLIAM DONALD SCHAEFER
GOVERNOR



STATE ETHICS COMMISSION

300 E. JOPPA ROAD, SUITE 301
TOWSON, MARYLAND 21286
(410) 321-3636
TDD (410) 333-3098

COMMISSION MEMBERS
WILLIAM J. EVANS, *CHAIRMAN*
SHIRLEY P. HILL
MARK C. MEDAIRDY, JR.
ROBERT C. RICE, Ph.D.
MARY M. THOMPSON

JOHN E. O'DONNELL
EXECUTIVE DIRECTOR
NANCY L. SPECK
GENERAL COUNSEL
ROBERT A. HAHN
STAFF COUNSEL

STATE ETHICS COMMISSION

FOURTEENTH ANNUAL REPORT

January 1, 1992 - December 31, 1992

STATE ETHICS COMMISSION

Fourteenth Annual Report

January 1, 1992 - December 31, 1992

GENERAL STATUTORY IMPLEMENTATION

The State Ethics Commission met 9 times during Calendar Year 1992. The number of meetings has been reduced due to fiscal limitations. The Commission and its staff were also forced to modify program operations in all areas due to reduced operational fiscal support caused by declining State revenues. Programs for automating lobbying and financial disclosure activities were particularly slowed as a result of fiscal cutbacks and the elimination of a staff paralegal position.

During the year the Commission was involved in program activity relating to all areas of its statutory mandate. These include financial disclosure, conflict of interest, lobbyist disclosure and restrictions, local government ethics laws, school board ethics regulations, advisory opinions, enforcement matters, employee education, and public information activities. Substantial activity during June and July was directed at implementing the provisions of HB 937, which reestablished ethics, campaign finance, and related restrictions on land use decisions in Prince George's County. The Commission also considered and approved faculty conflict of interest procedures for two campuses in the University of Maryland System. Commission regulations were reviewed during 1992 with adjustments being made where appropriate. In view of a lack of filing space and equipment, the Commission further revised its records retention program.

Issuance of Advisory Opinions

The Commission issues advisory opinions in response to requests from officials, employees, lobbyists, and others who are subject to the Law. Additionally, the Commission may issue advisory opinions to other persons at its discretion. During Calendar Year 1992, the Commission issued 13 formal published opinions. Most of the formal opinions issued primarily dealt with the employment or ownership interest prohibitions under §3-103(a) of the Ethics Law. Other issues considered included post-employment, situations involving relatives, and non-participation requirements. One factor reducing the number of formal opinion requests and opinions issued by the Commission is the large number of existing opinions that can now be used for fast informal guidance. The Commission staff was able to provide informal guidance in about 650 potential formal request situations based on existing opinions of the Commission. The Commission itself provided informal advice in lieu of formal opinion guidance, usually in the form of a letter, in 82 situations during the year. Informal guidance covered nearly all aspects of the Ethics Law. Many advice inquiries were in part caused by funding problems in State government. This has resulted in a substantial number of post-employment and secondary employment questions. The combined total number of advice situations (formal, Commission informal, and staff informal) increased significantly during 1992.

Financial Disclosure

The administration of the financial disclosure program continued to involve the identification of those required to file, providing technical assistance to filers, and monitoring compliance with the Law.

During calendar year 1991, computerization of the filing management part of this program was begun. Compliance review of forms is conducted as part of a phased program for review of the forms of officials and employees. Currently there are over 7,000 persons filing financial disclosure forms and this number continues to grow. In addition, copies of all judicial official financial disclosure forms are also filed at the Commission office. As part of the review program, letters are sent to filers regarding the need to provide further information in order to meet filing requirements. The elimination of the position assigned to carry out most of the review led to a substantially reduced review program during 1992.

In addition to the regular financial disclosure program, a substantial number of gubernatorial appointees to boards or commissions seeking limited conflict of interest exemptions from the appointing authority and from the Senate where confirmation is required, must file a form disclosing areas of existing conflicts with the Commission. The Commission staff coordinated the filing of these forms with the appointing authority and discussed the filing requirements with a large number of appointees throughout the year.

Lobbyist Disclosure and Regulation

During the lobbying year which ended on October 31, 1992, 1128 lobbying registrations were filed with the Commission. This represents an increase from the 1008 registrations filed in 1991 and the 911 filed in 1990. The 1128 registrations were filed by 484 different lobbyists on behalf of 698 separate employers. (Some employers have more than one lobbyist and many lobbyists have more than one employer.) This compares to 661 employers having one or more registrants in the previous year. The number of lobbyists actually decreased from the 498 registered in 1991 even though the number of employers increased. Although the largest number of lobbyists are registered during the legislative session, registrations are beginning and ending throughout the lobbying year, which begins on November 1 and ends on October 31 of the following year. Most persons registered to lobby have a single registration representing one employer, however, 76 lobbyists had two or more registrations during this time period, 44 registrants had four or more employers, and 30 lobbyists had eight or more employers.

The \$13,844,561 in lobbying expenditures reported for the period of October 31, 1992, represents an increase of \$989,682 over the previous year. Lobbying expenditures have significantly increased since the Commission reported \$2,864,454 of expenditures in 1979, the first year the Ethics Commission administered the filing program. An analysis of individual reports indicates that 72 lobbyist employers reported having total lobbying expenditures of \$50,000 or more. There were 154 lobbyist employers reporting total expenditures of \$25,000 or more. Reports of individual lobbyists registered on behalf of one or more employers indicate that 41 of these persons reported \$50,000 or more in compensation for services. Twenty-three lobbyists reported compensation of \$100,000 or more. Examples of topic areas involving large total employer expenditures during the reporting period included banking, health, labor, business, attorneys, utilities, lottery, horse racing, and insurance. A list of those employers expending \$25,000 or more and those lobbyists reporting \$50,000 or more in compensation is included in Appendices A and B of this report.

The following expenditure data summarizes lobbying expenditures for the last three lobbying years:

	<u>10/31/90</u>	<u>10/31/91</u>	<u>10/31/92</u>
1. Expenditures for meals and beverages for officials or employees or their immediate families.	\$ 393,927	\$ 416,924	\$ 413,610

2. Expenditures for special events, including parties, dinners, athletic events, entertainment, and other functions to which all members of the General Assembly, either house thereof, or any standing committee thereof were invited. (Date, location, group benefitted, and total expense for each event are also reported.)	\$ 229,030	\$ 310,793	\$ 242,169
3. Expenses for food, lodging, and scheduled entertainment of officials and employees and spouses for a meeting given in return for participation in a panel or speaking engagement at the meeting.	\$ 9,020	\$ 14,988	\$ 20,374
*4. Expenditures for gifts to or for officials or employees or their immediate families (not including sums reported in 1, 2, and 3).	\$ 166,299	\$ 146,313	\$ 127,177
<u>Subtotal of items 1, 2, 3, & 4</u>	<u>\$ 798,276</u>	<u>\$ 889,018</u>	<u>\$ 803,330</u>
5. Total compensation paid to registrant (not including sums reported in any other section).	\$ 8,666,614	\$ 9,719,863	\$10,436,523
6. Salaries, compensation and reimbursed expenses for staff of the registrant.	\$ 635,346	\$ 713,264	\$ 701,103
7. Office expenses not reported in items 5 and 6.	\$ 442,954	\$ 711,353	\$ 702,045
8. Cost of professional and technical research and assistance not reported in items 5 and 6.	\$ 189,672	\$ 273,779	\$ 401,749
9. Cost of publications which expressly encourage persons to communicate with officials or employees.	\$ 216,926	\$ 304,533	\$ 391,287

* This category includes the value of race track passes distributed by racing industry lobbyists to State officials. \$65,000 of the \$127,177 reported for gifts in the period ending 10/31/92 reflects the value of these passes.

10. Fees and expenses paid to witnesses.	\$ 10,619	\$ 4,850	\$ 33,351
11. Other expenses.	\$ 209,035	\$ 238,219	\$ 375,174
<u>Total of items 1 through 11</u>	<u>\$11,147,442</u>	<u>\$12,854,879</u>	<u>\$13,844,562</u>

Enforcement Activities

The Ethics Law and implementing rules of the Commission provide that any person may file a complaint with the Commission. Complaints filed with the Commission must be signed, under oath, and allege a violation of the Law by a person subject to the Law. Additionally, the Commission may file a complaint on its own initiative, and it carries out preliminary inquiries of potential law violations at its discretion. Because of the limited investigative resources available to the Commission and a shortage of operational expenses, there is a growing backlog of preliminary inquiries pending before the Commission.

In Calendar Year 1992 the Commission issued or accepted 87 complaints. Seventy-nine complaints involved financial disclosure matters, 4 complaints involved lobbyist matters, and 4 complaints related to conflict of interest issues. Also, during this year action was completed on 77 complaints. Seventy-one of these completed complaint cases were financial disclosure matters and 3 were lobbyist matters. Thirty-one complaints were still active at the end of the Calendar Year. Fifty-nine failure to file timely financial disclosure complaints were terminated by accepting late filing as a cure. Six late financial disclosure filing cases were completed by submission of the form, an admission of late filing violations, waiver of confidentiality, acceptance of a reprimand, and the payment of funds to the State. Two thousand dollars was collected as a result of this process. The Ethics Law provides for the possibility of late fees or court imposed fines in late filing situations in some circumstances.

The Commission considered several situations involving lobbyists who had failed to timely file either a registration or lobbying activity report. These matters resulted in lobbyists paying the fees in the amount of \$250 as allowed by the Ethics Law. The Commission received a total of \$1,750 in payments to the State of Maryland representing late fees from lobbyists.

A total of 3 conflict of interest complaints were resolved during calendar year 1992. Two complaints were dismissed after a preliminary investigation where the Commission found that the evidence did not merit further proceedings. One matter was resolved by an agreement where the respondent agreed to dispose of an interest and further agreed to prior review of future activities. At the end of calendar year 1992, 3 complaints were pending involving conflict of interest.

Local Government Ethics Laws

Maryland counties and cities are required under Title 6 of the Ethics Law to enact local laws similar to the State Law. In addition to the requirement that counties and cities enact ethics laws, in 1983, the General Assembly amended the Law to require local school boards either to promulgate ethics regulations similar to the State Law or be covered by county ethics laws. Most of the staff activity relating to local ethics programs during 1992 involved providing technical assistance to local ethics officials regarding ongoing administration of local government ethics programs. As part of its responsibilities, the Commission completed review and approval of revised local ethics laws for 4 localities during 1992. Some amended local laws were still under review at the end of the year.

Criteria for evaluating similarity to the State Law are defined in Commission regulations. Municipalities, based on size and other factors, may be exempted from all or part of the requirement, though an exemption may be granted only in response to a written request. Part of the Commission's regulatory review activity during 1992 included refining its exemption monitoring and review program which is generally designed for a structured review of municipal exemptions after each census. A preliminary review of all municipalities having exemptions was initially completed. More detailed review was made of three municipal exemptions based on the preliminary data. As a result of this review, two municipalities decided to enact local ethics laws. Further discussion is in process regarding a third city that currently has a partial exemption.

Educational and Informational Activities

The Commission staff has been active in providing information to those covered by the Ethics Law, as well as other persons interested in its requirements. A substantial daily staff workload has involved advising employees, officials, candidates and lobbyists on how to complete forms, and providing informal advice regarding possible conflicts of interest. The Commission staff has also assisted local government and school board officials in drafting their ethics laws and regulations. The staff has also provided technical advice to many local government ethics boards. Presentations were made by the staff to various groups covered by the Law or interested in the operation of the Law.

The Commission continued to maintain an office in Annapolis during the legislative session in order to provide assistance in the completion of lobbying or financial disclosure forms. The hours of operation for this office was reduced in 1992 due to budget restrictions.

Part of the Commission's public information activity involves distribution of lists of registered lobbyists and provision of assistance to persons inspecting various forms filed with the Commission. Pamphlets describing the Ethics Law have been made available to management level employees in State agencies. Another pamphlet covering ethics requirements for part-time members of State boards and commissions is also being distributed on a limited basis. The Commission had also initiated an Ethics Bulletin which covered prohibitions, rules, procedures and Commission decisions along with a special bulletin sent to lobbyists when changes are made in that program. These two bulletins have been suspended due to fiscal limitations. Fiscal limitations in 1992 have essentially eliminated the ability to develop printed materials and distribute mailed items relating to this part of the Commission program. A charge for those receiving the lobbyist list has been initiated due to insufficient printing funds. The Commission's staff did distribute, through interagency mail, a special two-page summary of ethics requirements to State agency managers with a request that they distribute the summary or post the summary so it would be available to employees. Substantial distribution was made to State employees by the various State agencies as a result of this activity. A special memo regarding the impact of the ethics law on gifts was also developed and distributed to agency managers in 1992.

LEGISLATIVE RECOMMENDATIONS AND ISSUES

In 1992, the General Assembly passed two bills that related to legislative recommendations of the Commission. One bill adjusted the standard used by the courts to set aside actions tainted by a conflict of interest. The other bill placed the Commissioners of three bi-county commissions under the jurisdiction of the State Ethics Commission. Another bill passed by the General Assembly reestablished the Prince George's County Zoning agency ethics program.

The Commission continues to review the adequacy of the Public Ethics Law as required by the statute. The four recommendations listed below were specifically suggested by the Commission as issues that would be appropriately addressed by legislation in 1992.

1. Lobbyist Gift Disclosure

Under the current requirements of the State Ethics Law, lobbyists are required to disclose compensation, expenses, and gifts. Gift disclosure detail varies according to the nature of the gift and its value. Although there can be differing views about the adequacy of the current disclosure, the Commission believes that there is a significant loophole in the Law relating to the cumulative value of smaller gifts or the use of proration among clients to avoid disclosure of gifts. This occurs as a result of section 5-105(a)(3) of the Law, which allows gifts totalling less than \$15 per day not to count toward a \$75 disclosure requirement as to recipient. More importantly, where a lobbyist has more than one client, the costs of gifts can usually be divided by a number of clients thus never reaching the threshold for disclosure as to person. It is proposed that where a lobbyist makes or is involved in making gifts totalling \$750 to one person from one or more donors during a six month reporting period that this be disclosed. The proposal would provide more realistic disclosure and create a more equitable set of disclosure rules. Under the current Law, lobbyists having more than one employer can avoid disclosure of gifts while those with only one employer must disclose larger or frequent gifts because proration of expenses is not available.

2. Financial Disclosure - Interest in Corporations

The existing Ethics Law requires the disclosure of corporate interests and the details regarding all corporate interests acquired or transferred during a reporting period. The requirement to report even minor changes is the subject of concern and errors by filers, particularly as it relates to changes typically caused by dividends or dividend reinvestment plans. It is proposed that minor dividend-related transactions less than \$500 not be required to be disclosed in detail. The requirement that the total number of shares held at the end of the year and for larger transactions to be reported in detail would not be impacted by this proposal.

3. Sheriff's Offices - Deputies and Sheriffs

In 1989, the Court of Appeals decided Rucker v. Harford County (316 MD 275), concluding that Deputy Sheriffs were officials, or employees of the State not the counties for certain purposes. The State Ethics Commission has taken the position, since 1979, that Sheriff's Office employees were local employees or officials subject to local ethics laws with two exceptions:

1. The elected Sheriff was determined to be a State official subject to the State Ethics Law under the Section 1-201(hh) of the Ethics Law.
2. The Baltimore City Sheriff's Office employees were determined to be State employees subject to the State Ethics Law under the provisions of Article 64A, Section 9E specifically placing them in the State employment system.

Recently one Sheriff's Office staff took the position that Rucker v. Harford County makes them subject to the State Ethics Law and not the county ethics law. The State Ethics Commission has taken the position, after a request by the local ethics commission, that Rucker v. Harford County is not sufficient authority for this position and has advised the County that it believes these persons continue to be covered by the local county ethics law. The purpose of this proposed legislation is to make clear that these employees are covered by county ethics laws.

4. Lobbyist - Registration Fees

The State Ethics Law lobbying program consists of administering a registration requirement and a reporting requirement. It also includes administering a prohibition against contingent fees and limitations on campaign finance activity by lobbyist. The filing part of the program has grown significantly since the Commission assumed the program in 1979. In 1980, there were 445 lobbying registrations. In the registration period ending October 31, 1992, there were 1128 registrations.

There are a variety of direct expenses associated with this program and additional costs related to the Commission per diem, staff compensation, and office rent. Direct costs include printing forms and informational materials, postage for distributing forms, program information and enforcement actions. Staff in-State travel is also a direct cost along with telephone costs associated with calls to registrants or employers.

In spite of the fact that this is a growing program with increasing costs attributable to program growth or higher rates charged for expense items, the amount of funds available to administer the program has actually declined. In view of this situation, the Commission has concluded that some type of lobbying registration fee to be used for support costs has become unavoidable. Several other states have already enacted lobbying registration fees.

The proposed program is to charge \$20 for each lobbyist registration in a lobbying year after the first registration. Based on current data, the estimated maximum payment by one lobbyist would be \$1000. Most lobbyists required to pay the fee would pay \$100 or less. This proposal would, therefore, allow people representing themselves or people representing where they work or those affiliated with a single non-profit group or trade association to register without fee. In essence, these entities or people would not be charged a registration fee for representing their own interest. On the other hand, those people who were in the lobbying business with more than one client in a year would pay the fee.

Other Legislative Recommendations

The recommendations listed below were made in previous Ethics Commission annual reports. The Commission continues to believe that these recommendations are appropriate, based on its experience in administering the ethics program:

- The Law should prohibit participation in matters involving adult children of the official or employee.
- The Law should be formally amended to more specifically reflect advice by the Commission and the Attorney General regarding testimonial fund raising by employees and officials, which is fully covered by the Ethics and Elections Law.
- The post-employment for full-time officials and employees needs to be strengthened by prohibiting participation for compensation activities for 12 months after leaving State service if the matter is one that was in existence and part of the official's responsibility during the persons last 12 months of service.
- There is a need to consider clearly adding former officials and employees to the persons prohibited from using confidential information under §3-107 of the Law.

- There is a need to consider granting the Commission at least minimal fining authority in conflict of interest matters in order to reduce delay and expensive court proceedings.

- Section 7-101 of the Law should be revised to make it clear that any fine levied by a court will be paid to the State of Maryland.

- The current Law does not seem to clearly deal with gifts from foreign governments. There is a need to review the issue and clarify the Law.

- The Ethics Law prohibits certain types of representation before State agencies. However, except for legislative disclosure under §3-102 of the Ethics Law, there is no specific required disclosure of representation before State agencies. It is recommended that officials who appear before State agencies for compensation include on their annual disclosure form at a minimum the identity of any agencies involved in this compensated representation.

- The Ethics Law prohibits employees and non-elected officials from intentionally using their prestige of office for their own private gain or that of another. Elected officials, however, are not covered by this provision. The existing Law should be amended to include elected officials or a new provision covering these officials dealing with clear cases of abuse should be specifically added to the Law.

- Issues regarding the spouses of employees or officials have arisen in Maryland and on a national basis. The Maryland Public Ethics Law does not consistently and clearly address these issues or provide sufficient policy guidance in these matters. Spouse ethics issues have become more prevalent in part as a reflection of both spouses having careers and other economic relationships. For example, the Law does not clearly deal with the acceptability of gifts to spouses of officials or employees by prohibited donors. Additionally, the financial disclosure provisions do not clearly address gifts received by the spouse to be disclosed by the employee or official even where such gifts are from donors normally requiring official disclosure. Another significant area needing further clarification is under what circumstances is the ownership interest of a spouse to be attributed to the official or employee for conflict of interest purposes under §3-103(a) of the Ethics Law.

- The Commission receives many questions from agencies and others concerning issues involving State related foundations. Some of these questions related clearly to the Ethics Law and can be resolved by the Commission. Many of these questions involve fiscal and general policy issues unrelated or only indirectly related to the Ethics Law. It is not possible for the Commission to determine appropriate policy in these areas. Any control mechanisms that need to be established to reach these concerns should be established by the Executive and Legislative branches of government as part of ongoing policy development.

- A blind trust program should be considered for persons coming into State service or office who have broad diversified stock holdings.

- The criteria for financial disclosure by executive and legislative branch officials utilize qualitative considerations in addition to salary. The financial disclosure standards for judicial branch employees utilize only a salary standard. As a result of this standard, certain judicial personnel, such as court reporters, are included in the filing requirements. The Commission believes the judicial financial disclosure standards should be amended to include qualitative criteria in addition to salary.

- Consideration should be given to having new officials file a financial disclosure statement covering their holdings as of the time when they come into their position rather than for the previous calendar year.

- The need for disclosure of interests in mutual funds should be reviewed to determine if this information is fully necessary to accomplish the purposes of the Law.

- The provisions of §4-104(c) regarding attributable interests should be modified to reduce the burden caused by the disclosure requirements when a person has a small share in a large diverse testamentary trust.

- Judicial candidates should be required to file financial disclosure in each year of their candidacy in the same way as other State officials.

- In election years improperly filed candidate's disclosure forms create unique enforcement problems. Before a violation can be found and made public a variety of confidential administrative and adjudicatory processes have to occur. In most cases this process would extend well beyond the primary election and probably beyond the general election. This means that serious completion problems or even false disclosure could exist unknown to the voting public. A very large percentage of non-incumbent candidates have substantial financial disclosure statement completion problems. A review should be made by the Executive and the General Assembly to determine whether confidentiality should be eliminated for candidate's financial disclosure enforcement cases at an earlier point in the enforcement process.

- Some consideration should be given to removing the current language dealing with Commission review of forms in §2-103(e), and substituting a provision for review consistent with standards to be established by the Commission.

- In order to avoid uncertain and confusing application and administration of the Law, the special provisions of §6-202 making members of State boards funded in whole or in part by Baltimore County subject to the county disclosure law instead of the State Law should be considered for elimination, or at a minimum copies of these forms should be filed with the State Ethics Commission.

- The bi-county agency ethics regulations requirements as to employees of these agencies should be reviewed to make sure that sufficient penalty provisions are provided and that the current ethics regulations of the agencies meet the intent of the Law.

- The Commission has informally determined that the bi-county agencies are to be treated as State or local agencies for the purposes of exemptions under the State lobbying registration requirements. The Law should be amended to specifically clarify their status under these provisions.

- There is a need to review whether the requirement that a lobbyist must always be in the physical presence of an official in order to be required to register should be retained in the Law.

- The lobbyists restrictions regarding campaign finance activity should be made more specific as to the impact of these provisions on political party central committee membership by lobbyists.

- The provisions for confidentiality in the Ethics Law should be reviewed to determine if they adequately protect privacy without denying needed information to operations agencies or the public.

- The provisions covering school board ethics regulations need to be strengthened to assure that there are adequate sanctions for violations by board members, candidates for board membership and lobbyists.

APPENDIX A

EMPLOYER SPENDING \$25,000 OR MORE - ALL REGISTRANTS ALL TYPES OF EXPENSES

November 1, 1991 - October 31, 1992

<u>TOTAL AMOUNT</u>	<u>EMPLOYER</u>
1. \$370,385.45	Maryland Bankers Association
2. 278,350.00	Medical & Chirurgical Faculty of Maryland
3. 245,135.78	Health Facilities Association of Maryland
4. 205,985.25	Maryland State Teachers Association
5. 194,931.73	Blue Cross & Blue Shield of Maryland
6. 172,502.41	GTECH Corporation
7. 162,376.54	Maryland Chamber of Commerce
8. **160,267.44	Maryland Jockey Club
9. 152,437.43	Planned Parenthood of Metropolitan Wash.
10. 130,127.74	Cable TV Assn. of MD., DEL., & D.C.
11. 120,674.77	Common Cause/Maryland
12. 116,116.35	R. J. Reynolds Tobacco Company
13. 114,680.61	C & P Telephone Company of Maryland
14. 114,063.83	State Farm Insurance
15. 110,202.11	Maryland Retail Merchants Association
16. 109,250.39	Maryland State Bar Association
17. 106,800.11	Citibank (MD), N.A. T/A Choice
18. 98,176.51	American Petroleum Institute
19. 96,232.00	IBM Corporation
20. 95,872.76	Maryland Highway Contractors Association
21. 95,023.37	Lockheed Air Terminal, Inc.
22. 94,973.42	Potomac Electric Power Company
23. 90,692.39	Maryland Classified Employees Association

**(Includes Race Track Passes of \$65,000.00)

24.	88,969.49	Chemical Industry Council of Maryland
25.	88,791.64	Marylanders for Efficient & Safe Highways
26.	84,000.00	Dupont Company
27.	83,787.76	Radiation Care, Inc.
28.	83,419.42	Johns Hopkins Health System
29.	82,883.87	Blue Cross & Blue Shield of the National Capital Area
30.	76,424.87	Philip Morris, U.S.A.
31.	75,704.60	Maryland Trial Lawyers Association
32.	75,602.36	First National Bank of Maryland
33.	74,589.17	A T & T
34.	72,464.29	Baltimore Gas & Electric Company
35.	72,451.05	Nationwide Insurance Company
36.	70,696.40	Maryland Catholic Conference
37.	70,004.53	Independent Cement Corporation
38.	69,412.30	GEICO Corporation
39.	69,249.84	Bethesda Chevy Chase Chamber of Commerce
40.	68,816.76	Pharmaceutical Manufacturers Association
41.	68,747.63	Maryland State Dental Association
42.	67,826.33	Maryland Farm Bureau, Inc.
43.	67,585.00	CSX Corporation
44.	67,538.97	Household International
45.	67,470.14	Maryland Association of Health Maintenance Organization
46.	66,809.19	Cogen Technologies, Inc.
47.	65,709.02	Tobacco Institute
48.	64,550.07	Maryland New Car and Truck Dealers Assn.
49.	62,507.26	Marine Spill Response Corporation
50.	61,966.70	Crown Central Petroleum
51.	60,655.00	Maryland Independent College and University Association

52.	60,358.78	Medical Mutual Liability Insurance Society of Maryland
53.	60,195.00	Maryland General Hospital
54.	59,060.67	Rouse Company, Inc.
55.	57,811.02	Maryland State & D.C. AFL-CIO
56.	56,671.46	Todds' Lane Limited Partnership
57.	55,951.59	Bethlehem Steel Corporation
58.	55,090.43	Giant Food, Inc.
59.	54,980.00	Maryland Hospital Association
60.	54,105.99	Systems Control, Inc.
61.	53,900.00	Maryland Petroleum Council
62.	53,868.26	American Insurance Association
63.	53,769.41	Maryland Horse Coalition
64.	53,576.15	National Federation of Independent Businesses
65.	52,450.10	UPJOHN Company
66.	52,060.42	Maryland Association of Certified Public Accountants
67.	51,409.12	ATANCA (Automotive Trade Association of the National Capital Area)
68.	51,102.33	Maryland Association of Chain Drug Stores
69.	50,904.03	STAPA (Shock Trauma Associates, PA)
70.	50,891.92	VALIC (Variable Annuity Life Insurance)
71.	50,258.85	Maryland Association of Realtors
72.	50,151.92	Maryland Medical Laboratory, Inc.
73.	49,717.22	Coalition for Competition
74.	48,912.52	Maryland Builders Association
75.	48,587.52	Associated Builders and Contractors of Maryland
76.	48,543.24	Potomac Edison Company, Inc.
77.	47,438.10	National Assn. of Independent Insurers
78.	47,013.22	Enviro-Gro Technologies
79.	46,467.15	Chambers Development Co. Inc.

80.	46,355.90	Johnson & Johnson Pharmaceutical
81.	46,000.00	Helix Health System
82.	45,399.94	CSX Transportation
83.	45,370.36	Baltimore Jewish Council
84.	44,951.80	Johns Hopkins University
85.	44,779.81	Golden Rule Insurance Company
86.	44,589.51	P.I.E. Mutual Insurance Company
87.	43,996.37	Washington Gas, Maryland Division
88.	43,879.81	Pfizer, Inc.
89.	43,770.65	MED Mutual
90.	42,898.47	United Way of Central Maryland
91.	42,473.94	Maryland Association of Mutual Insurance Companies (MAMIC)
92.	41,726.58	Glaxo, Inc.
93.	40,433.30	Chesapeake Bay Foundation
94.	40,006.80	Neurology Center, P.A., The
95.	39,427.65	Montgomery County Association of Realtors
96.	39,010.00	Associated Builders & Contractors-Anne Arundel-So.Md. Chapter
97.	38,663.96	Maryland Psychological Association
98.	38,260.00	Association of Maryland Pilots
99.	37,936.15	Merck, Sharp & Dohme
100.	37,825.44	UNISYS Corporation
101.	37,268.66	The Ryland Group
102.	37,190.12	Healthplus
103.	36,924.36	Advance Finance Company, Inc.
104.	36,746.04	Maryland Securities Industries
105.	36,512.76	Maryland Insurance Council
106.	36,121.83	Youth Services International
107.	36,028.30	Kaiser Foundation Health Plan of Mid-Atlantic States

108. 35,550.78	Health Insurance Association of America
109. 35,368.30	Maryland Managed Care Association, Inc.
110. 34,938.79	Sun Oil Company, Inc.
111. 33,834.03	Columbia Country Club
112. 33,215.83	Correctional Medical Systems
113. 32,676.94	League of Life & Health Insurers of Md.
114. 32,551.40	Anheuser-Busch Companies, Inc.
115. 32,500.00	Waste Management of North America, Inc.
116. 32,166.86	FMC Agricultural Chemicals
117. 32,000.00	Maryland Aggregates Assn. Inc.
118. 31,878.21	Distilled Spirits Council of the U.S.Inc.
119. 31,400.00	National Medical Enterprises, Inc.
120. 31,305.05	Motor Vehicle Manufacturers Assn.
121. 30,960.61	Professional Insurance Agents of PA., MD., and DEL., Inc.
122. 30,566.46	Maryland REA, Inc.
123. 29,896.23	Maryland Land Title Association
124. 29,818.87	Mid-Atlantic Coca Cola
125. 29,680.49	Commercial Wholesale Distributors' Coalition
126. 29,515.01	Wheat, First Securities, Inc.
127. 29,263.30	Marriott Corporation
128. 29,157.87	Environmental Recycling Associates, Inc.
129. 29,081.88	Maryland Assn. of Boards of Education
130. 28,977.65	Maryland Motor Truck Association, Inc.
131. 28,484.50	Nordion International/A Division of MDS Health Group
132. 28,188.88	Maryland Cab Association
133. 27,898.56	Manor Healthcare Corporation
134. 27,880.04	Mid-Atlantic Petroleum Distributors Assn.
135. 27,820.61	Cardiac Enhancement Center, Inc.

136. 27,408.44	Restaurant Association of Maryland, Inc.
137. 27,184.60	Teachers Insurance & Annuity Assn.
138. 27,058.41	Group Health Association
139. 26,924.74	University of Maryland Medical System
140. 26,909.82	60 NR Committee
141. 26,392.60	Maryland Chiropractic Association
142. 26,000.00	American Council of Life Insurance
143. 25,999.06	Property Owners Assn. of Greater Baltimore
144. 25,774.98	Suburban Maryland Building Industry Assn.
145. 25,755.64	Maryland Rental Car Coalition
146. 25,377.97	Maryland Civil Justice Coalition
147. 25,365.02	MD/DC/Vending Association, Inc.
148. 25,318.64	Maryland Chapter of the American Academy of Pediatrics
149. 25,300.00	Children's National Medical Center
150. 25,288.67	Jostens Learning Corporation
151. 25,156.74	Advocates for Highway & Auto Safety
152. 25,085.26	Legal Aid Bureau, Inc.
153. 25,069.32	Health & Welfare Council, Inc.
154. 25,000.00	Greater Washington Board of Trade

APPENDIX B

LOBBYISTS RECEIVING \$50,000 OR MORE IN COMPENSATION ALL CLIENTS

November 1, 1991 - October 31, 1992

1.	\$752,649.98	Bereano, Bruce, C.
2.	625,307.00	Rifkin, Alan, M.
3.	467,245.00	Evans, Gerard, E.
4.	397,217.75	Goldstein, Franklin
5.	370,430.80	Cooke, Ira, C.
6.	304,350.00	McCoy, Dennis, C.
7.	271,400.00	Doyle, James, J., Jr.
8.	258,125.00	Manis, George, N.
9.	217,519.22	Burridge, Carolyn, T.
10.	198,384.91	Enten, D. Robert
11.	192,743.75	Schwartz, Joseph, A., III
12.	169,296.45	Tiburzi, Paul, A.
13.	162,817.00	Pitcher, J. William
14.	154,731.27	Doolan, Devin John
15.	153,420.52	Neil, John, B.
16.	150,734.00	Goeden, James, P.
17.	147,749.41	Doherty, Daniel, T.
18.	139,909.00	Adler, Maxine
19.	126,798.15	Barbera, Thomas, P.
20.	125,262.50	Silver, Edgar, P.
21.	117,300.00	Neily, Alice, J.

22.	115,517.90	Shaivitz, Robin, F.
23.	104,500.00	Rasmussen, Dennis
24.	98,350.50	Canning, Michael, F.
25.	97,326.25	Popham, Bryson, F.
26.	93,614.37	Davis, Michael, H.
27.	90,416.67	O'Dell, Wayne
28.	70,000.00	Skaggs, L. Craig
29.	70,000.00	Sweeney, Robert
30.	64,000.00	Bigley, Shirley, L.
31.	62,413.29	Winchester, Albert, III
32.	62,166.00	Tracy, Fran
33.	62,000.00	Wyatt, Maurice
34.	61,031.90	Steward, William, R.
35.	57,220.00	Miller, Herman, B.
36.	54,000.00	Levin, Barbara
37.	53,300.00	Epstein, Harvey, A.
38.	52,000.00	Mandel, Marvin
39.	50,051.40	Gray, Carroll
40.	50,000.00	Scher, Barry, F.
41.	50,000.00	Thienel, Stephen

